EPA Facility Identifier: 1000 0024 3818 Plan Sequence Number: 1000086687

Section 1. Registration Information

Source Identification

Facility Name: New Chester Renewable Energy, LLC

Parent Company #1 Name: DTE Biomass Energy, Inc.

Parent Company #2 Name:

Submission and Acceptance

Submission Type: First-time submission

Subsequent RMP Submission Reason:

Description:

Receipt Date: 14-May-2020 Postmark Date: 14-May-2020 Next Due Date: 14-May-2025 Completeness Check Date: 14-May-2020 Yes

Complete RMP:

De-Registration / Closed Reason:

De-Registration / Closed Reason Other Text:

De-Registered / Closed Date:

De-Registered / Closed Effective Date:

Certification Received:

Facility Identification

EPA Facility Identifier: 1000 0024 3818

Other EPA Systems Facility ID: Facility Registry System ID:

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:

Parent Company #1 DUNS: 876234923

Parent Company #2 DUNS:

Facility Location Address

Street 1: 2563 5th Avenue

Street 2:

City: **Grand Marsh** State: WISCONSIN ZIP: 53936

ZIP4:

County: **ADAMS**

Facility Latitude and Longitude

Latitude (decimal): 43.877184 -89.681368 Longitude (decimal):

Lat/Long Method: Interpolation - Satellite Loading Area Centroid Lat/Long Description:

Horizontal Accuracy Measure:

Horizontal Reference Datum Name: World Geodetic System of 1984

Source Map Scale Number:

EPA Facility Identifier: 1000 0024 3818 Plan Sequence Number: 1000086687

Owner or Operator

Operator Name: DTE Biomass Energy, Inc.

Operator Phone: (734) 913-2080

Mailing Address

Operator Street 1: 414 S. Main St Suite 600

Operator Street 2:

Operator City:Ann ArborOperator State:MICHIGANOperator ZIP:48104

Operator ZIP4:

Operator Foreign State or Province:

Operator Foreign ZIP: Operator Foreign Country:

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:

RMP Title of Person or Position: Regional Operations Manager

RMP E-mail Address:

Emergency Contact

Emergency Contact Name: Krista Hofmann

Emergency Contact Title: Regional Operations Manager

Emergency Contact Phone: (920) 634-1156 Emergency Contact 24-Hour Phone: (920) 634-1156

Emergency Contact Ext. or PIN:

Emergency Contact E-mail Address: matthew.stahl@dteenergy.com

Other Points of Contact

Facility or Parent Company E-mail Address:

Facility Public Contact Phone:

Facility or Parent Company WWW Homepage

Address:

Local Emergency Planning Committee

LEPC: Adams LEPC

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site: 2

FTE Claimed as CBI:

Covered By

OSHA PSM: Yes

EPCRA 302:

CAA Title V:

EPA Facility Identifier: 1000 0024 3818 Plan Sequence Number: 1000086687

Air Operating Permit ID:

701034730-P01

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency)

Date:

Last Safety Inspection Performed By an External

Agency:

Never had one

Predictive Filing

Did this RMP involve predictive filing?:

Yes

Preparer Information

Preparer Name: NTH Consultants, Ltd. Preparer Phone: (248) 553-6300

Preparer Street 1: 41780 Six Mile Road; Suite 200

Preparer Street 2:

Preparer City:
Preparer State:
MICHIGAN
Preparer ZIP:
48168
Preparer ZIP4:

Preparer Foreign State:
Preparer Foreign Country:
Preparer Foreign ZIP:

Confidential Business Information (CBI)

CBI Claimed:

Substantiation Provided: Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents:

See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID: 1000108115

Description: Compressed Natural Gas

Process Chemical ID: 1000135158

Program Level: Program Level 3 process

Chemical Name: Methane
CAS Number: 74-82-8
Quantity (lbs): 95000

CBI Claimed:

Flammable/Toxic: Flammable

EPA Facility Identifier: 1000 0024 3818 Plan Sequence Number: 1000086687

Process NAICS

Process ID: 1000108115
Process NAICS ID: 1000109428

Program Level: Program Level 3 process

NAICS Code: 22121

NAICS Description: Natural Gas Distribution

EPA Facility Identifier: 1000 0024 3818 Plan Sequence Number: 1000086687

Section 2. Toxics: Worst Case

EPA Facility Identifier: 1000 0024 3818 Plan Sequence Number: 1000086687

Section 3. Toxics: Alternative Release

EPA Facility Identifier: 1000 0024 3818 Plan Sequence Number: 1000086687

Section 4. Flammables: Worst Case

Flammable Worst ID: 1000065204

Model Used: Endpoint used: EPA's RMP*Comp(TM)

1 PSI

Passive Mitigation Considered

Blast Walls: Other Type:

EPA Facility Identifier: 1000 0024 3818 Plan Sequence Number: 1000086687

Section 5. Flammables: Alternative Release

Flammable Alter ID: 1000061057

Model Used: EPA's RMP*Comp(TM)

Passive Mitigation Considered

Dikes:

Fire Walls:

Blast Walls:

Enclosures:

Other Type:

Active Mitigation Considered

Sprinkler System:

Deluge System:

Water Curtain:

Excess Flow Valve:

Other Type:

EPA Facility Identifier: 1000 0024 3818 Plan Sequence Number: 1000086687

Section 6. Accident History

EPA Facility Identifier: 1000 0024 3818 Plan Sequence Number: 1000086687

Section 7. Program Level 3

Description

Compressed Natural Gas

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID: 1000113980 Chemical Name: Methane Flammable/Toxic: Flammable CAS Number: 74-82-8

Process ID: 1000108115

Description: Compressed Natural Gas

Prevention Program Level 3 ID: 1000091703 NAICS Code: 22121

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):

31-Mar-2020

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):

08-Aug-2019

The Technique Used

What If:

Checklist:

What If/Checklist:

Yes

HAZOP:

Failure Mode and Effects Analysis:

Fault Tree Analysis: Other Technique Used:

PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):

16-Apr-2020

Major Hazards Identified

Toxic Release:

Fire: Yes Explosion: Yes

Runaway Reaction: Polymerization:

Overpressurization: Yes Yes Corrosion: Overfilling: Yes Contamination: Yes **Equipment Failure:** Yes Loss of Cooling, Heating, Electricity, Instrument Air:

Facility Name: New Chester Renewable Energy, LLC EPA Facility Identifier: 1000 0024 3818 Plan Sequence Number: 1000086687 Earthquake: Floods (Flood Plain): Yes Tornado: Hurricanes: Other Major Hazard Identified: **Process Controls in Use** Vents: Yes Relief Valves: Yes Check Valves: Yes Scrubbers: Flares: Yes Manual Shutoffs: Yes Automatic Shutoffs: Yes Interlocks: Yes Alarms and Procedures: Yes Keyed Bypass: Emergency Air Supply: **Emergency Power:** Yes Backup Pump: Yes Grounding Equipment: Inhibitor Addition: Rupture Disks: Excess Flow Device: Quench System: Purge System: None: Other Process Control in Use: Mitigation Systems in Use Sprinkler System: Dikes: Fire Walls: Blast Walls: Deluge System: Water Curtain: Enclosure: Neutralization: None: Yes Other Mitigation System in Use: Monitoring/Detection Systems in Use Process Area Detectors: Yes Perimeter Monitors:

None:

Other Monitoring/Detection System in Use:

Changes Since Last PHA Update

Reduction in Chemical Inventory: Increase in Chemical Inventory: Change Process Parameters:

EPA Facility Identifier: 1000 0024 3818 Plan Sequence Number: 1000086687

Yes

Installation of Process Controls:

Installation of Process Detection Systems:

Installation of Perimeter Monitoring Systems:

Installation of Mitigation Systems:

None Recommended:

None:

Other Changes Since Last PHA or PHA Update:

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):

31-Mar-2020

Training

Training Revision Date (The date of the most recent 13-Feb-2020 review or revision of training programs):

The Type of Training Provided

Classroom: Yes
On the Job: Yes
Other Training:

The Type of Competency Testing Used

Written Tests:

Oral Tests:

Demonstration:

Observation:

Yes

Other Type of Competency Testing Used:

Maintenance

Maintenance Procedures Revision Date (The date of 01-Apr-2020 the most recent review or revision of maintenance procedures):

Equipment Inspection Date (The date of the most recent equipment inspection or test):

01-Apr-2020

Equipment Tested (Equipment most recently inspected or tested):

NEED THIS

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):

Change Management Revision Date (The date of 03-Apr-2020 the most recent review or revision of management of change procedures):

EPA Facility Identifier: 1000 0024 3818 Plan Sequence Number: 1000086687

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):

24-Apr-2020

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):

03-Apr-2020

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most 17-Feb-2020 recent review or revision of hot work permit procedures):

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):

03-Apr-2020

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):

Confidential Business Information

CBI Claimed:

EPA Facility Identifier: 1000 0024 3818 Plan Sequence Number: 1000086687

Section 8. Program Level 2

EPA Facility Identifier: 1000 0024 3818 Plan Sequence Number: 1000086687

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):

Facility Plan (Does facility have its own written emergency response plan?):

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):

Healthcare (Does facility's ER plan include information on emergency health care?):

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan):

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees):

Local Agency

Agency Name (Name of local agency with which the New Chester Fire Department facility ER plan or response activities are coordinated):

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):

(715) 302-0017

Yes

Subject to

OSHA Regulations at 29 CFR 1910.38: Yes

OSHA Regulations at 29 CFR 1910.120: Clean Water Regulations at 40 CFR 112:

RCRA Regulations at CFR 264, 265, and 279.52:

OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:

State EPCRA Rules or Laws:

Other (Specify):

EPA Facility Identifier: 1000 0024 3818 Plan Sequence Number: 1000086687

Executive Summary

Clean Air Act Amendments Section 112 (r) (7) Accidental Release Prevention Programs: 40 CFR Part 68 Subpart G Risk Management Plan

EXECUTIVE SUMMARY

The facility is a stationary source that is subject to the Risk Management Programs under the Clean Air Act, Section 112 (r)(7) (as promulgated in 40 Code of Federal Regulations Part 68). The facility stores methane (a flammable gas) in quantities in excess of the 10,000 pound Risk Management Program threshold.

Pursuant to 40 CFR § 68.150, the facility is required to submit a single Risk Management Plan (RMP) that includes the information required by § 68.150 through 68.195. The facility is also required to provide an executive summary in the RMP. The following is a brief description of various elements of the facility's Risk Management Program, as required by 40 CFR § 68.155:

(a) THE ACCIDENTAL RELEASE PREVENTION AND EMERGENCY RESPONSE POLICIES AT THE STATIONARY SOURCE

New Chester Renewable Energy, LLC recognizes that the safe handling of methane is critical to the welfare of the community. New Chester Renewable Energy, LLC recognizes that the U.S. Environmental Protection Agency lists methane as a regulated flammable substance pursuant to the Accidental Release Prevention and Risk Management Program regulations.

Bew Chester Renewable Energy, LLC is committed to the implementation of the stringent safety precautions required by the regulation for methane at its facility. These safety precautions are necessary to prevent accidental releases of methane that could threaten the health of employees, contractors, and the members of the community. To this end, New Chester Renewable Energy, LLC implements routine equipment maintenance, operational procedures, employee training and coordination with and (where necessary) notification of emergency responders, and is committed to compliance with all applicable state and federal regulation.

(b) THE STATIONARY SOURCE AND REGULATED SUBSTANCES HANDLED

The facility produces gas in digesters that receive manure from dairy farms and treats the produced biogas to produce renewable compressed natural gas.

The facility compresses the raw gas, removes moisture and feeds the gas through a series of membranes to remove the majority of hydrogen sulfide and carbon dioxide. The hydrogen sulfide and carbon dioxide are directed to a thermal oxidizer where the hydrogen sulfide is destroyed. The treated gas is directed to scavenger units where traces of hydrogen sulfide are adsorbed onto solid media. The cleaned renewable natural gas is further compressed and loaded onto trucks for transport to a remote station for injection into a natural gas pipeline.

(c) THE GENERAL ACCIDENTAL RELEASE PREVENTION PROGRAM AND CHEMICAL-SPECIFIC PREVENTION STEPS

The facility has established an accidental release prevention program, which establishes the protocols needed to safely handle and use methane. The plan is designed to prevent and minimize the effects of an unplanned, sudden or non-sudden incidents involving methane.

Specifically this plan protects the community using a combination of operating procedures and safe work practices, equipment design, emergency operations and shut-down procedures, design, detection, and employee training and education.

In the event that the digester gas cannot be treated, there is a process upset, the gas does not meet specifications, the thermal oxidizer is not available or trucks are not available to receive the cleaned gas, the gas is directed to a flare for destruction.

The facility is equipped with explosive gas detectors, hydrogen sulfide detectors and flame detectors. The process controls are programmed to initiate an emergency shutdown and sound an alarm if any of these detectors are activated.

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The requirements of the accidental release prevention program will be implemented as an on-going compliance policy to ensure that methane is safely stored, handled and used by the facility. This plan provides direction for the current and future use and handling of methane so as to minimize its impact on the community.

(d) THE FIVE-YEAR ACCIDENT HISTORY

The facility is new; in the last five (5) years, there have been no releases that have resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage.

(e) THE EMERGENCY RESPONSE PROGRAM

The facility does not intend to have its personnel respond to any major emergencies. If able to safely do so, in the event of a fire, explosion or hazardous material release emergency, facility personnel will press the emergency stop (E-Stop) to activate the local alarm and initiate a process emergency shut down. Emergency shutdown will also be initiated by the control system under a number of scenarios. When the local alarm sounds, or if a fire or explosion occurs, facility personnel evacuate to a safe distance and contact local emergency responders in accordance with the facility's Emergency Action Plan.

(f) PLANNED CHANGES TO IMPROVE SAFETY

The facility is new; no changes are planned to improve safety.